

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

RONNELL BOWMAN,  
MICHAEL ANDERSON,  
JOEL BLAKE,  
BYRON CLAYPOOL,  
CAMERON COHEN  
JAVONTE COTTON,  
LADARIUS DAVIS-HUGHES,  
TERRY DEAN,  
LARRY ECHOLS,  
DEMETRIUS EXUM,  
LARRY HAMILTON,  
VERNELL HAMILTON

[REDACTED],  
AKEEM HUDSON,  
RONNIE JACKSON,  
CALVIN KIDD,  
MARCUS MALBRO,  
DEAUTRIS MATTISON,  
QUEVON MCKINNIE,  
CHASE NANEZ,  
ANDREW PORTIS,  
MAURICE RITTMAN,  
RAMON SAVAGE,  
TIMOTHY SCOTT,  
KEORIE SMITH,  
KEJUAUN THOMAS,  
LAWRENCE TURNER,  
CHAZZ WHITE,  
JALEN WILLIAMS, and  
JAQUAN WRIGHT,

Defendants.

23-CR-077

Case No. 23-CR-

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[18 U.S.C. §§ 2(a), 371, 1341, 1349,  
922(g)(1), 922(g)(2), 924(a)(2),  
924(a)(8), 924(c), 924(j) & 1958; 21  
U.S.C. §§ 841(a)(1), 841(b)(1)(C), &  
841(b)(1)(D)]

INDICTMENT

**THE GRAND JURY CHARGES THAT:**

**Background Allegations**

At times material to this Indictment:

1. The “Wild 100s,” a/k/a “Shark Gang,” a/k/a “SNG,” was a street gang operating in the Milwaukee, Wisconsin area. The defendants herein, who are all members and affiliates of the “Wild 100s,” a/k/a “Shark Gang,” a/k/a “SNG,” engaged in various criminal activities, including crimes of violence, illegal firearms possession, drug distribution, conspiracy, and fraud in Milwaukee and elsewhere.

2. Unemployment Insurance (“UI”) is a joint state and federal program overseen by the U.S. Department of Labor that provides monetary benefits to eligible beneficiaries. UI payments are intended to provide temporary financial assistance to lawful workers who are unemployed through no fault of their own. Beginning in or around March 2020, in response to the COVID-19 pandemic, several federal programs expanded UI eligibility and increased UI benefits, including the Pandemic Unemployment Assistance Program (“PUA”), Federal Pandemic Unemployment Compensation (“FPUC”), Pandemic Emergency Unemployment Compensation (“PEUC”), and the Lost Wages Assistance Program (“LWAP”). These funds were distributed to the states’ UI programs from the United States Department of the Treasury.

3. In the State of California, the Employment Development Department (“EDD”) based in Sacramento, California, administers the state’s UI program. Those seeking UI benefits from the EDD submit online applications. Applicants must answer specific questions to establish eligibility to receive UI benefits, including their

name, Social Security Number (“SSN”), and mailing address, among other things. Applicants also must self-certify that they met a COVID-19-related reason for being unemployed, partially employed, or unable to work. The EDD relies upon the information in the application to determine eligibility for UI benefits. Once an application is approved, the EDD typically distributes state and federal UI benefits electronically to a debit card in the claimant’s name, which the claimant can use to withdraw funds and make purchases. These debit cards are sent via the U.S. Postal Service to the address the claimant provides. Claimants can activate their debit card via telephone or online.

4. Individuals filing for COVID-19 PUA benefits transmitted all required information via computer, cellular device, and other mobile electronic device.

5. A PUA application required individualized attestations that the information was true and correct, as well as ongoing weekly certifications attesting to continued unemployed status and job-seeking activities.

**COUNT ONE**  
(Mail Fraud Conspiracy)

**The Conspiracy and its Object**

6. Beginning in or about August 2020, and continuing through in or about February 2022, in the State and Eastern District of Wisconsin and elsewhere,

**RONNELL BOWMAN,  
MICHAEL ANDERSON,  
JOEL BLAKE,  
BYRON CLAYPOOL,  
CAMERON COHEN,  
JAVONTE COTTON,  
LADARIUS DAVIS-HUGHES,  
TERRY DEAN,**

LARRY ECHOLS,  
DEMETRIUS EXUM,  
LARRY HAMILTON,  
VERNELL HAMILTON,  
AKEEM HUDSON,  
RONNIE JACKSON,  
CALVIN KIDD,  
MARCUS MARLBRO,  
DEAUTRIS MATTISON,  
QUEVON MCKINNIE,  
CHASE NANEZ,  
ANDREW PORTIS,  
MAURICE RITTMAN,  
RAMON SAVAGE,  
TIMOTHY SCOTT,  
KEORIE SMITH,  
KEJUAUN THOMAS,  
LAWRENCE TURNER,  
CHAZZ WHITE,  
JALEN WILLIAMS, and  
JAQUAN WRIGHT

knowingly conspired with each other and others, known and unknown to the Grand Jury, to devise a scheme to defraud the United States Department of Labor by means of materially false and fraudulent pretenses, and for the purpose of executing that scheme, caused mail matter to be sent by the Postal Service, in violation of Title 18, United States Code, Section 1341.

**Manner and Means of the Conspiracy**

7. In order to accomplish the purpose of the conspiracy, the defendants used, and caused others to use, the following manner and means:

a. The defendants communicated about and taught each other how to submit fraudulent PUA claims to California EDD and other state UI programs through social media platforms.

b. In some instances, the defendants obtained the personal identifiable

information (“PII”) of unwitting third parties and submitted fraudulent PUA claims to California EDD and other state UI programs.

c. In other instances, the defendants solicited willing participants with whom they agreed to charge a fee, usually a portion of the PUA benefits obtained on the claimant’s behalf, to obtain PUA benefits in the claimant’s name.

d. The defendants electronically submitted applications to multiple states on behalf of themselves and others, in which they made materially false and fraudulent representations.

e. The defendants’ materially false and fraudulent representations caused California EDD and other states to award PUA funds in the claimants’ names through pre-loaded debit cards mailed to various locations, both in and outside the Eastern District of Wisconsin.

f. Using the debit cards they obtained under false pretenses, the defendants withdrew cash from automatic teller machines (“ATMs”) located in the Eastern District of Wisconsin and elsewhere.

g. The defendants used the PUA funds they fraudulently obtained to purchase, among other things, firearms, controlled substances, jewelry, clothing, vacations, and to solicit murder for hire.

h. As a result of the conspiracy, the defendants fraudulently obtained millions of dollars of federal PUA benefits from California EDD and other state-administered UI programs to which they were not entitled.

All in violation of Title 18, United States Code, Sections 1349 and 2(a).

**COUNTS TWO through TWENTY SIX**  
(Mail Fraud)

**THE GRAND JURY FURTHER CHARGES THAT:**

11. Beginning in or about August 2020 and continuing through in or about February 2022, in the State and Eastern District of Wisconsin and elsewhere,

**RONNELL BOWMAN,  
MICHAEL ANDERSON,  
JOEL BLAKE,  
BYRON CLAYPOOL,  
CAMERON COHEN,  
JAVONTE COTTON,  
LADARIUS DAVIS-HUGHES,  
TERRY DEAN,  
LARRY ECHOLS,  
DEMETRIUS EXUM,  
LARRY HAMILTON,  
VERNELL HAMILTON,  
AKEEM HUDSON,  
CALVIN KIDD,  
MARCUS MARLBRO,  
DEAUTRIS MATTISON,  
CHASE NANEZ,  
ANDREW PORTIS,  
MAURICE RITTMAN,  
RAMON SAVAGE,  
TIMOTHY SCOTT,  
KEORIE SMITH,  
LAWRENCE TURNER,  
CHAZZ WHITE,  
JALEN WILLIAMS, and  
JAQUAN WRIGHT**

knowingly devised and participated in a scheme to defraud the United States Department of Labor by means of materially false and fraudulent pretenses and representations.

### The Scheme to Defraud

12. The essence of the scheme was to fraudulently obtain UI payments by means of submitting false applications to the departments within the states that administered their UI programs.

### Execution of the Scheme to Defraud

13. For the purpose of executing the scheme to defraud, on or about the dates specified below, each of the following defendants knowingly caused to be delivered by United States mail the following:

<u>Count</u>	<u>Defendant(s)</u>	<u>Date</u>	<u>Description of mailing</u>
2	RONNELL BOWMAN	8/30/2020	An envelope containing a PUA debit card delivered to XXXX W. Locust Street, Milwaukee, Wisconsin, through the United States Postal Service.
3	MICHAEL ANDERSON	8/03/2021	An envelope containing a PUA debit card delivered to XXXX W. Walnut Street, Milwaukee, Wisconsin, through the United States Postal Service.
4	JOEL BLAKE	3/28/2021	An envelope containing a PUA debit card delivered to XXXX N. 52nd Street, Milwaukee, Wisconsin, through the United States Postal Service.
5	BYRON CLAYPOOL	7/11/2021	An envelope containing a PUA debit card delivered to XXXX W. Fond Du Lac Avenue, #2, Street, Milwaukee, Wisconsin, through the United States Postal Service.
6	CAMERON COHEN	5/0/2021	An envelope containing a PUA debit card delivered to XXXX N. 66th Street, Milwaukee, Wisconsin, through the United States Postal Service.
7	JAVONTE COTTON & MARCUS MALBRO	11/10/2020	An envelope containing a PUA debit card delivered to XXXX W. Roosevelt Drive, Milwaukee, Wisconsin, through the United States Postal Service.
8	LADARIUS DAVIS-HUGHES	8/26/2020	An envelope containing a PUA debit card delivered to XXXXX W. Wildwood Lane, #201, Milwaukee, Wisconsin, through the United States Postal Service.
9	TERRY DEAN	3/09/2021	An envelope containing a PUA debit card delivered to XXXX N. 21st Street, Milwaukee, Wisconsin, through the United States Postal Service.

10	LARRY ECHOLS	8/23/2020	An envelope containing a PUA debit card delivered to XXXX W. Kneeland Street, Milwaukee, Wisconsin, through the United States Postal Service.
11	DEMETRIUS EXUM	8/16/2020	An envelope containing a PUA debit card delivered to XXXX N. 40th Street, Milwaukee, Wisconsin, through the United States Postal Service.
12	LARRY HAMILTON	8/19/2020	An envelope containing a PUA debit card delivered to XXXXA N. 24th Place, Milwaukee, Wisconsin, through the United States Postal Service.
13	VERNELL HAMILTON	9/20/2021	An envelope containing a PUA debit card delivered to XXXX N. 60th Street, Unit H, Milwaukee, Wisconsin, through the United States Postal Service.
14	AKEEM HUDSON	9/02/2020	An envelope containing a PUA debit card delivered to XXXX N. 58th Street, Milwaukee, Wisconsin, through the United States Postal Service.
15	CALVIN KIDD	12/15/2020	An envelope containing a PUA debit card delivered to XXXX W. Hampton Avenue, Milwaukee, Wisconsin, through the United States Postal Service.
16	DEAUTRIS MATTISON	9/12/2021	An envelope containing a PUA debit card delivered to XXXX N. 74th Street, Milwaukee, Wisconsin, through the United States Postal Service.
17	CHASE NANEZ	9/27/2021	An envelope containing a PUA debit card delivered to XXXX Honeysuckle Road, Hartford, Wisconsin, through the United States Postal Service.
18	ANDREW PORTIS	8/27/2020	An envelope containing a PUA debit card delivered to XXXX N. Lover's Lane, #1, Milwaukee, Wisconsin, through the United States Postal Service.
19	MAURICE RITTMAN	12/06/2021	An envelope containing a PUA debit card delivered to XXXX N. 18th Street, Milwaukee, Wisconsin, through the United States Postal Service.
20	RAMON SAVAGE	8/08/2021	An envelope containing a PUA debit card delivered to XXXX W. Fond Du Lac Avenue, Milwaukee, Wisconsin, through the United States Postal Service.
21	TIMOTHY SCOTT	8/26/2020	An envelope containing a PUA debit card delivered to XXXX N. Bourbon Street, Milwaukee, Wisconsin, through the United States Postal Service.
22	KEORIE SMITH	7/01/2021	An envelope containing a PUA debit card delivered to XXXX W. Waterford Avenue, #7, Milwaukee, Wisconsin, through the United States Postal Service.
23	LAWRENCE TURNER	8/16/2020	An envelope containing a PUA debit card delivered to XXXX N. 9 <sup>th</sup> Street, Milwaukee, Wisconsin, through the United States Postal Service.

24	CHAZZ WHITE	8/19/2020	An envelope containing a PUA debit card delivered to XXXX W. Northridge Court, #6, Milwaukee, Wisconsin, through the United States Postal Service.
25	JALEN WILLIAMS	12/27/2020	An envelope containing a PUA debit card delivered to XXXX W. Locust Street, Milwaukee, Wisconsin, through the United States Postal Service.
26	JAQUAN WRIGHT	3/10/2021	An envelope containing a PUA debit card delivered to XXXX N. 56th Street, Milwaukee, Wisconsin, through the United States Postal Service.

Each in violation of Title 18, United States Code, Sections 1341 and 2(a).

**COUNT TWENTY-SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

Beginning on or about March 15, 2021, and continuing until on or about April 5, 2021, within the State and Eastern District of Wisconsin, the Southern District of Texas, and elsewhere,

**RONNELL BOWMAN and  
RONNIE JACKSON**

did knowingly and intentionally use and conspire with each other and others, known and unknown to the Grand Jury, to use a facility of interstate commerce, with intent that a murder be committed, in violation of the laws of Wisconsin, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value; namely, in exchange for a payment of money, Ronnell Bowman and Ronnie Jackson agreed with each other and others to have N.B. killed, which arrangements depended in part upon communications over social media platforms and by cellular telephones operating on interstate networks, and which resulted in the death of N.B.

In violation of Title 18, United States Code, Sections 1958 and 2(a).

**COUNT TWENTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 5, 2021, in the State and Eastern District of Wisconsin,

**RONNELL BOWMAN and RONNIE JACKSON**

knowingly used, carried, and discharged a firearm during and in relation to a crime of violence, that is, Murder for Hire, as charged in Count Twenty-Seven of this Indictment, causing the death of N.B. through the use of a firearm, and which killing was murder as defined in Title 18, United States Code, Section 1111.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii), 924(j), and 2(a).

**COUNT TWENTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Beginning in or about July of 2020 and continuing until on or about April 21, 2023, in the State and Eastern District of Wisconsin, the Southern District of Texas, and elsewhere,

**RONNELL BOWMAN,  
MAURICE RITTMAN,  
JAQUAN WRIGHT,  
JAVONTE COTTON,  
RAMON SAVAGE,  
KEORIE SMITH,**

**MICHAEL ANDERSON,  
CHAZZ WHITE,  
RONNIE JACKSON,  
QUEVON MCKINNIE,  
DEMETRIUS EXUM,  
LARRY HAMILTON,  
KEJUAN THOMAS, and  
JALEN WILLIAMS**

knowingly and willfully conspired with each other and others, known and unknown to the Grand Jury, to commit offenses against the United States, namely:

- (a) to knowingly sell and otherwise dispose of firearms to prohibited persons, in violation of Title 18, United States Code, Sections 922(d)(1) and 2(a);
- (b) to knowingly transfer firearms, knowing that such firearm would be used to commit a crime of violence and drug trafficking crime, in violation of Title 18, United States Code, Sections 924(h) and 2(a);
- (c) to knowingly possess and transfer machineguns, in violation of Title 18, United States Code, Sections 922(o) and 2(a); and
- (d) to knowingly possess firearms by a prohibited person, in violation of Title 18, United States Code, Sections 922(g) and 2(a).

2. To further the conspiracy, the conspirators committed acts in the Eastern District of Wisconsin, including but not limited to:

(a) On or about December 18, 2020, Javonte Cotton sent a message to Ronnell Bowman asking to "swap" his Glock firearm and stated that, "we just found six more switches," meaning machineguns.

All in violation of Title 18, United States Code, Sections 371 and 2(a).

**COUNT THIRTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 18, 2020, in the State and Eastern District of Wisconsin,

**MAURICE RITTMAN,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, namely, a loaded Draco AK style 7.62x3 9mm pistol bearing serial number PE-6274-2018 and a loaded Cobray MAC-11 9mm pistol with an obliterated serial number, which, prior to his possession of each, had been transported in interstate and foreign commerce, the possession of which was therefore in and affecting commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT THIRTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 29, 2021, in the State and Eastern District of Wisconsin,

**JAQUAN WRIGHT,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a black Romarm Cugir model DRACO, 7.62X39 caliber AK-47 style pistol, bearing serial number DB-9411-18 which, prior to his possession of it, had been transported in interstate and foreign commerce, the possession of which was therefore in and affecting commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT THIRTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 17, 2022, in the State and Eastern District of Wisconsin,

**JAVONTE COTTON,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a Glock model 22, .40 caliber handgun, bearing serial number EUC995US, which prior to his possession of it, had been transported in interstate and foreign commerce, the possession of which was therefore in and affecting commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT THIRTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 17, 2022, in the State and Eastern District of Wisconsin,

**JAVONTE COTTON**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; and a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(1)(D).

**COUNT THIRTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about May 17, 2022, in the State and Eastern District of Wisconsin,

**JAVONTE COTTON**

knowingly possessed a firearm in furtherance of the drug trafficking crime charged in Count Thirty-Three of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT THIRTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 16, 2022, in the State and Eastern District of Wisconsin,

**RAMON SAVAGE,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a loaded Glock model 17, 9mm handgun, bearing serial number BNBP264, with a 30-round extended magazine, which, prior to his possession of it, had been transported in interstate and foreign commerce, the possession of which was therefore in and affecting commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

**COUNT THIRTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 18, 2022, in the State and Eastern District of Wisconsin,

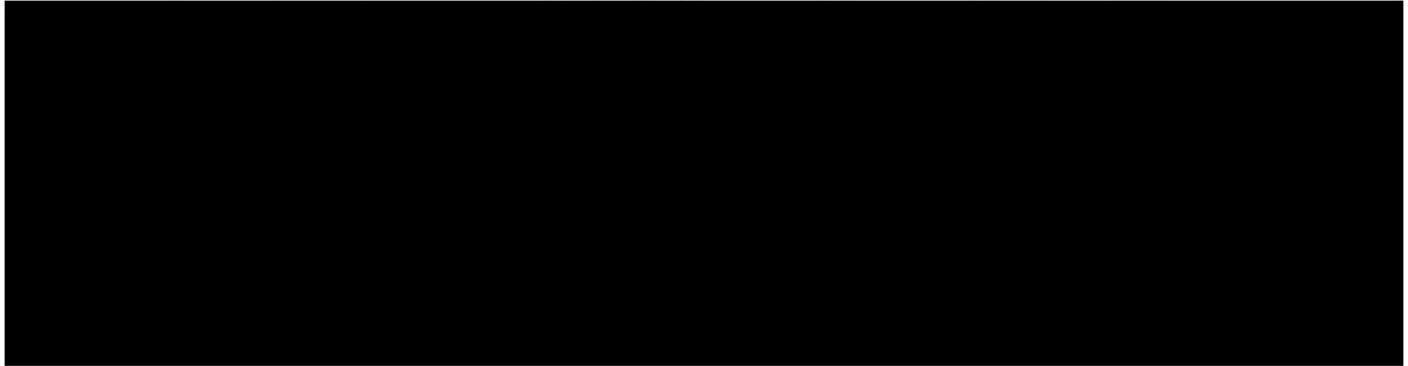
**KEORIE SMITH,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a Glock 29, 9mm handgun, bearing serial number XUW802, which, prior to his possession of it, had been transported in interstate and foreign commerce, the possession of which was therefore in and affecting commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:



**COUNT THIRTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 13, 2022, in the State and Eastern District of Wisconsin,

**MICHAEL ANDERSON,**

who was then a fugitive from justice, willfully received a firearm that had been transported in interstate commerce, that is, a loaded Glock model 17 9mm handgun, bearing serial number ZYF969, with an extended magazine.

In violation of Title 18, United States Code, Sections 922(g)(2) and 924(a)(8).

**COUNT THIRTY-NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 19, 2022, in the State and Eastern District of Wisconsin,

**CHAZZ WHITE,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, namely, a Mossberg MC20 9mm pistol, bearing serial number 006751MC; and a Taurus PT 111 Millennium G2 handgun, bearing serial number TKW03923, which, prior to his possession of each, had been transported in interstate and foreign commerce, the possession of which was therefore in and affecting commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

**COUNT FORTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 19, 2022, in the State and Eastern District of Wisconsin,

**CHAZZ WHITE**

knowingly and intentionally possessed with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT FORTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 19, 2022, in the State and Eastern District of Wisconsin,

**CHAZZ WHITE**

knowingly possessed firearms in furtherance of the drug trafficking crime charged in Count Forty of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT FORTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 20, 2023, in the State and Eastern District of Wisconsin,

**QUEVON MCKINNIE,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, namely, a Glock 27 Gen4 .40 caliber handgun, bearing serial number SUR275, which prior to his possession of it, had been transported in interstate and foreign commerce, the possession of which was therefore in and affecting commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

**COUNT FORTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 21, 2023, in the State and Eastern District of Wisconsin,

**KEORIE SMITH,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, namely, a Glock 27 .40 caliber handgun, bearing serial number RFY004, with an extended magazine, which prior to his possession of it, had been transported in interstate and foreign commerce, the possession of which was therefore in and affecting commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

## FORFEITURE NOTICE

1. Upon conviction of the mail fraud conspiracy, as set forth in Count One of this Indictment, in violation of Title 18, United States Code, Section 1349, or mail fraud, as set forth in Counts Two through Twenty Six of this Indictment, the defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense or offenses, including, but not limited to a sum of money equal to the proceeds derived from the offenses.

2. Upon conviction of the firearms offenses in violation of Title 18, United States Code, Sections 922(g)(1), 922(g)(2), 922(o), and 924(c) set forth in Counts Twenty-Eight, Thirty through Thirty-Two, Thirty-Four through Thirty-Nine, and Forty-One through Forty-Three of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the offenses, including, but not limited to:

- a. a loaded Draco AK style 7.62x3 9mm pistol bearing serial number PE-6274-2018;
- b. a loaded Cobray MAC-11 9mm pistol with an obliterated serial number;
- c. a black Romarm Cugir model DRACO, 7.62x39 caliber AK-47 style pistol, bearing serial number DB-9411-18;
- d. a Glock model 22, .40 caliber handgun, bearing serial number EUC995US,

- e. a loaded Glock model 17, 9mm handgun, bearing serial number BNBP264, with a 30-round extended magazine;
- f. a Glock 29, 9mm handgun bearing serial number XUW802;
- g. a Glock model 19X, 9mm handgun, bearing serial number AFBK451, with a machinegun conversion device;
- h. a loaded model 17 9mm Glock handgun bearing serial number ZYF969, with an extended magazine;
- i. a Mossberg MC20 9mm pistol, bearing serial number 006751MC;
- j. a Taurus PT 111 Millennium G2 handgun, bearing serial number TKW03923;
- k. a Glock, 27 Gen4 .40 caliber handgun, bearing serial number SUR275; and
- l. a Glock 27 .40 caliber handgun, bearing serial number RFY004, with an extended magazine.

3. Upon conviction of the controlled substance offenses in violation of Title 21, United States Code, Section 841 set forth in Counts Thirty-Three and Forty of this Indictment, the defendants shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense, including but not limited to a sum of money representing the amount of proceeds obtained as a result of the offenses.

4. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).



RELEASER

Dated: 4-25-23

  
GREGORY J. HAANSTAD  
United States Attorney